

## **CONTINUATION OF APPLICATION FOR A SEARCH WARRANT**

### **SUMMARY OF AFFIDAVIT**

I am applying for a warrant to search two iPhones. This summer, a confidential informant told investigators that Facebook user "Shonn Dollaz" was selling methamphetamine throughout Kalamazoo, Michigan, and that "Shonn Dollaz" was using Facebook messenger to set up drug deals. The informant also identified a specific phone number that "Shonn Dollaz" was using. About two weeks later, a federal defendant identified "Shonn Dollaz" as one of his sources of supply during a proffer interview, and he confirmed he was using the same phone number to contact "Shonn Dollaz" that the confidential informant stated he/she was using. Afterwards, investigators used the same informant to conduct a controlled purchase of approximately  $\frac{1}{4}$  pound of methamphetamine from Rashon Miles on August 4, 2021. They did so again on August 30, 2021, yielding another  $\frac{1}{4}$  of methamphetamine. Both deals were arranged using a phone.

On September 2, 2021, investigators executed a federal search warrant on an apartment where Miles had been staying. Police found about 2 pounds of methamphetamine behind a bed in one of the rooms, and on the same bed, they found a red iPhone. Miles was arrested that day, and investigators found a second iPhone on Miles's person when they searched him incident to arrest.

Based on these and other facts described below, I submit there is probable cause that Miles was using phones to traffic methamphetamine. Consequently, I submit there is probable cause that a search of the phones seized on September 2 and 3 will uncover evidence of methamphetamine distribution and possession with intent to distribute the same contrary to 21 U.S.C. § 841(a).

### **AGENT BACKGROUND**

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI), Department of Homeland Security (DHS), assigned to the Special Agent in Charge (SAC) Office in Detroit, Michigan, and have been so employed since March 9, 2012. I am currently assigned to the Assistant Special Agent in Charge (ASAC) Office in Grand Rapids, Michigan and primarily work out of Post of Duty (POD) Battle Creek, Michigan. I have a Bachelor of Arts degree in Political Science from Youngstown State University. I have successfully completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I have also received training in the manner and means by which individuals engage in narcotics

trafficking. Prior to my employment with HSI, I was a Senior Special Agent with the Diplomatic Security Service (DSS) serving in Iraq, Pakistan, and Afghanistan. Prior to my employment with DSS, I was an ATSAC with the Federal Air Marshal Service (FAMS) in charge of the Investigations Division, Counter Terrorism Branch at Headquarters. Prior to my employment with the FAMS, I was an Agent with the United States Border Patrol serving as a Team Leader with the Special Operations Group(s) in San Diego, California. I possess over twenty-three years of federal law enforcement experience. As part of my duties, I investigate criminal violations relating to narcotics trafficking, including violations pertaining to the illegal production, distribution, receipt and possession of illegal drugs, and associated conspiracy in violation of Title 21, United States Code, Sections 841, and 846. I have received training and instruction in the field of investigation of narcotics trafficking and have had the opportunity to participate in investigations relating to the trafficking of illegal drugs.

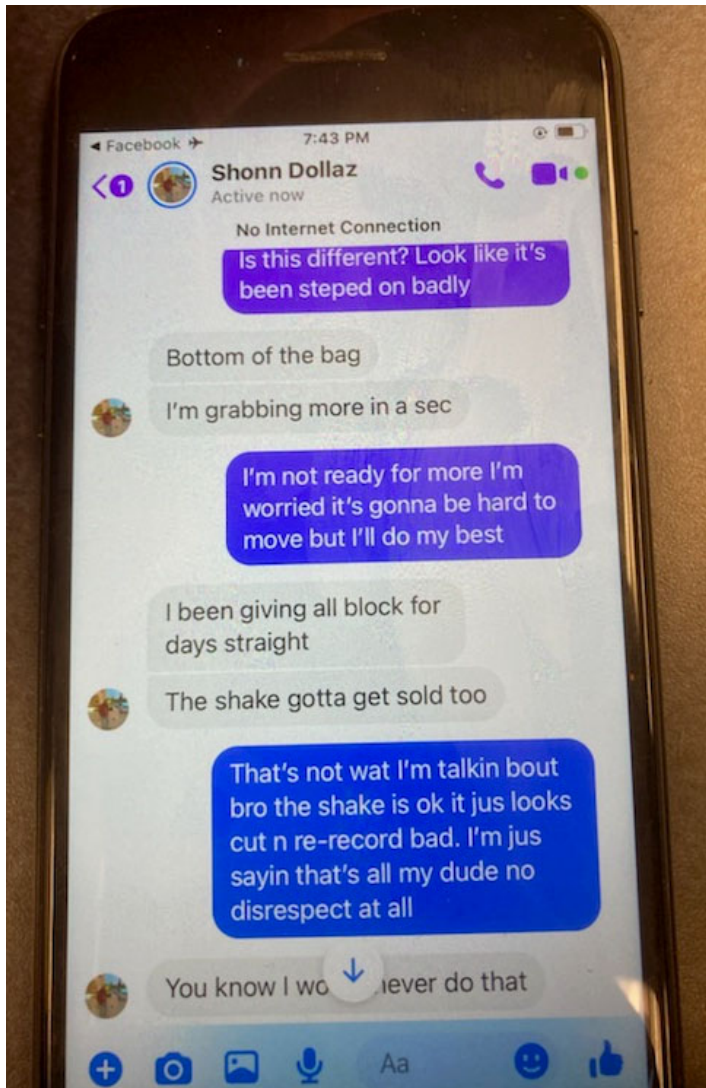
### **PROBABLE CAUSE**

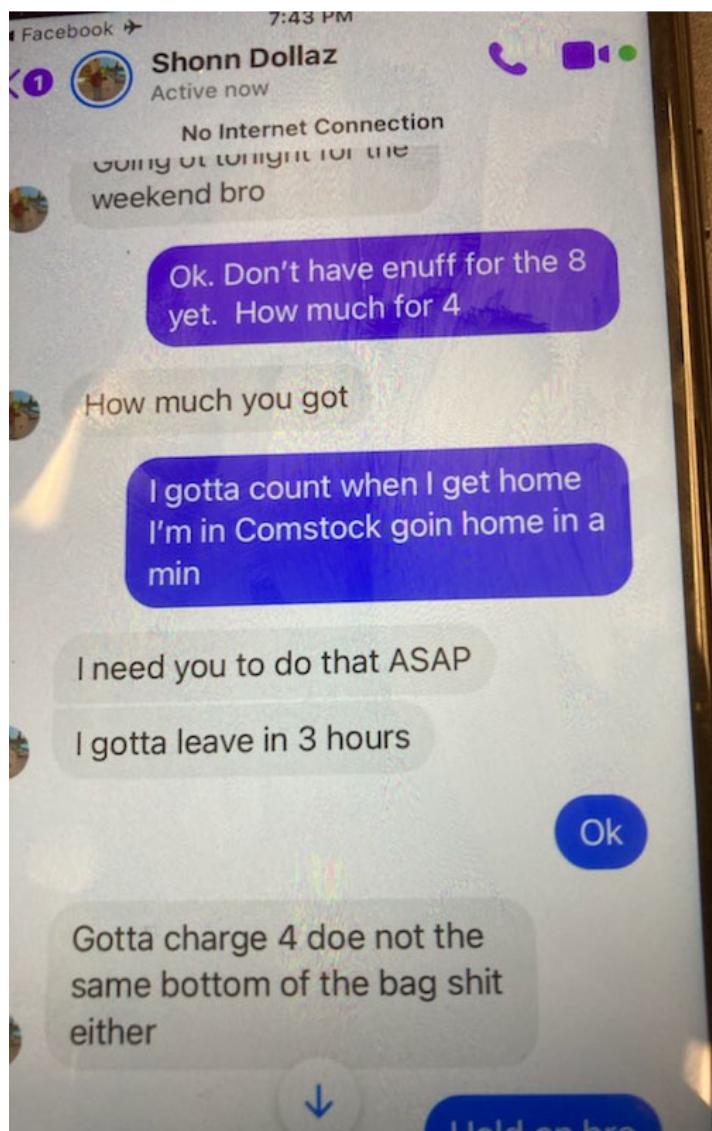
The purpose of this affidavit is to establish probable cause. It does not relate everything known to investigators.

*A Methamphetamine Arrestee Identifies "Shonn Dollaz" as his Source of Supply*

2. On April 29, 2021, members of the Kalamazoo, Michigan Kalamazoo Valley Enforcement Team (KVET) executed a search warrant at the residence of Ricky James Vandewege. Investigators found approximately 6 ounces of crystal methamphetamine. Vandewege was arrested, and during a post-Miranda interview, Vandewege told law enforcement that a person behind the Facebook username "Shonn Dollaz" was his main source of methamphetamine supply. Vandewege also stated that he regularly communicated through Facebook messenger with "Shonn Dollaz" to arrange methamphetamine deals. Investigators searched Vandewege's phone and found numerous communications pertaining to drug deals between Vandewege and "Shonn Dollaz."

- a. Below are some examples the messages. As context, I know from my training and experience that "shake" refers to the flaky material commonly found in the bottom of a bag of methamphetamine. I know that "shake" is considered as a less desirable product than chunky or "ice" methamphetamine because its powdery form makes it possible for dealers to mix it with adulterants that dilute the quality of the product but increase the amount of product that a dealer can sell.





*Another Methamphetamine Arrestee Identifies "Shonn Dollaz" as his Source of Supply*

3. On June 16, 2021, KVET executed a search warrant at the residence of Joshua Jecoa Mitchell. Mitchell was found to be in possession of approximately six ounces of methamphetamine and taken into custody. During a post-Miranda interview, Mitchell stated his source of methamphetamine supply was "Shonn Dollaz", and that he was on Facebook. Mitchell was shown the Facebook page of "Shonn Dollaz" and confirmed him to be the same individual. Mitchell stated that he once saw "Shonn Dollaz" with approximately 12 pounds of methamphetamine.

- a. The Facebook unique ID information for the "Shonn Dollaz" account that investigators showed to Mitchell is:

<https://m.facebook.com/shon.miles.948>



*A Confidential Informant Tells Investigators that "Shonn Dollaz" is Selling Methamphetamine.*

4. On July 7, 2021, CI-2110 provided law enforcement with information that "Shonn Dollaz" was selling large quantities of methamphetamine in Kalamazoo, and was using phone number 269-808-3667 and Facebook Messenger to facilitate methamphetamine deals.

- a. CI - 2110 has conducted four successful controlled buys from two, separate methamphetamine dealers and has provided information to law enforcement which has proven reliable on over thirty occasions. These controlled buys and information provided have led to the seizure of over a pound of methamphetamine, six ounces of cocaine/crack, and two firearms. Hence, CI-2110's information has proven to be accurate and reliable. CI-2110 is currently assisting law enforcement for possible leniency in a pending case.
- b. CI-2110 has previous convictions for multiple offenses which are summarized below. I have included this information as it may be relevant to assessing the credibility of CI-2110. In order to protect the anonymity of the source, I have not included jurisdictional information, specific numbers of convictions, and date of conviction data.
  - i. possession of marijuana or synthetic equivalents;
  - ii. attempted misdemeanor resisting & obstructing a police officer;
  - iii. possession of methamphetamine;
  - iv. misdemeanor retail fraud (multiple convictions, with one conviction occurring in 2020);
  - v. operating/maintaining a lab involving methamphetamine;
  - vi. felony resisting & obstructing a police officer;
  - vii. misdemeanor breaking & entering; and
  - viii. possession of controlled substance analogues.

5. On July 21, 2021, federal defendant Marshall Gurnee provided a proffer interview to law enforcement. Gurnee had been indicted with federal methamphetamine and gun

charges following a search of his apartment on or about February 18, 2021. Gurnee stated “Shonn Dollaz” was a source of supply in Kalamazoo. Gurnee was shown an evidence picture of the crystal methamphetamine seized from Gurnee’s apartment at the date of his arrest on February 18, 2021. Gurnee stated one bag of crystal methamphetamine from his apartment, which weighed approximately 400 grams, was supplied to him by “Shonn Dollaz.” Gurnee stated he communicated with Dollaz via 269-808-3667, Text Now, and Facebook Messenger. Investigators obtained a search warrant for Gurnee’s TextNow account, and they found communications between Gurnee and a contact saved as “Kzoo Plug” using 269-808-3667. This was the same phone number that CI-2110 linked to “Shonn Dollaz” on July 7, 2021. Also, from my training and experience, I know that the term “plug” is a common term for a source of illegal drugs.

- a. Gurnee’s TextNow account revealed approximately 43 communications with 269-808-3667. Many of the communications are consistent with drug dealing. For example, on January 28, 2021, Gurnee messaged this number stating, “Yeah its under by a oz but its still at a good price fam I’m fuck with you fr.” “Kzoo Plug” responded “My peoples did some bs then my bad bro.”
- b. From my training and experience, I know that methamphetamine is often purchased in ounce and pound quantities. Thus, I understand Gurnee’s message above to be a claim that “Kzoo plug” sold him a quantity of methamphetamine that was one ounce less than an agreed upon weight, but that he still wished to deal with “Kzoo Plug” because of his good price.
- c. Investigators obtained a search warrant for Gurnee’s Facebook account. the return was limited by the date range of September 1, 2020 through February 18, 2021. The results of the search did not include any messages between Gurnee’s account and “Shonn Dollaz.” However, they did show that Gurnee searched for the terms “dollars” and “dollarz” more than once. These searches are consistent with an unsuccessful attempt to find “Shonn Dollaz” by his street name on Facebook. Here are some examples from February 18, 2021, just before Gurnee’s apartment was searched:

**Time** 2021-02-18 18:56:11 UTC  
**Type** Search  
**Summary** Marshall Gurnee searched for "dollars".  
**Object Id** S:\_I100010353872228:1324412814580502:19

**Time** 2021-02-18 18:38:54 UTC  
**Type** Search  
**Summary** Marshall Gurnee searched for "dollars".  
**Object Id** S:\_I100010353872228:1324412814580502:18

**Time** 2021-02-18 18:26:17 UTC  
**Type** Search  
**Summary** Marshall Gurnee searched for "dollars".  
**Object Id** S:\_I100010353872228:1324412814580502:17

**Time** 2021-02-18 18:23:52 UTC  
**Type** Search  
**Summary** Marshall Gurnee searched for "#dollarz".  
**Object Id** S:\_I100010353872228:1324412814580502:16

*The Confidential Informant Uses a Phone to Arrange the Purchase  
of Approximately ¼ Pound of Methamphetamine from Rashon Miles.*

6. On August 4, 2021, KVET investigators, used CI-2110 conducted a controlled buy of crystal methamphetamine from Rashon MILES. Before the deal, investigators showed CI-2110 a picture of Rashon Anthony MILES, and he/she confirmed that this was the person that he/she knew as "Shonn Dollaz." Investigators watched as CI-2110 set up the deal via text messages with the number 269-808-3667, which is the same number that was separately identified by the CI and by Marshall Gurnee as belonging to a methamphetamine source of supply. Investigators strip-searched CI-2110's person and searched CI-2110's vehicle. These searches determined that CI-2110 was not in possession of any controlled substances. CI-2110 then drove to the agreed upon meet location, and investigators watched MILES enter CI-2110's vehicle. CI-2110 provided MILES with \$1,400 in official buy funds. MILES gave CI-2110 approximately ¼ pound of a substance that later field tested positive for methamphetamine.

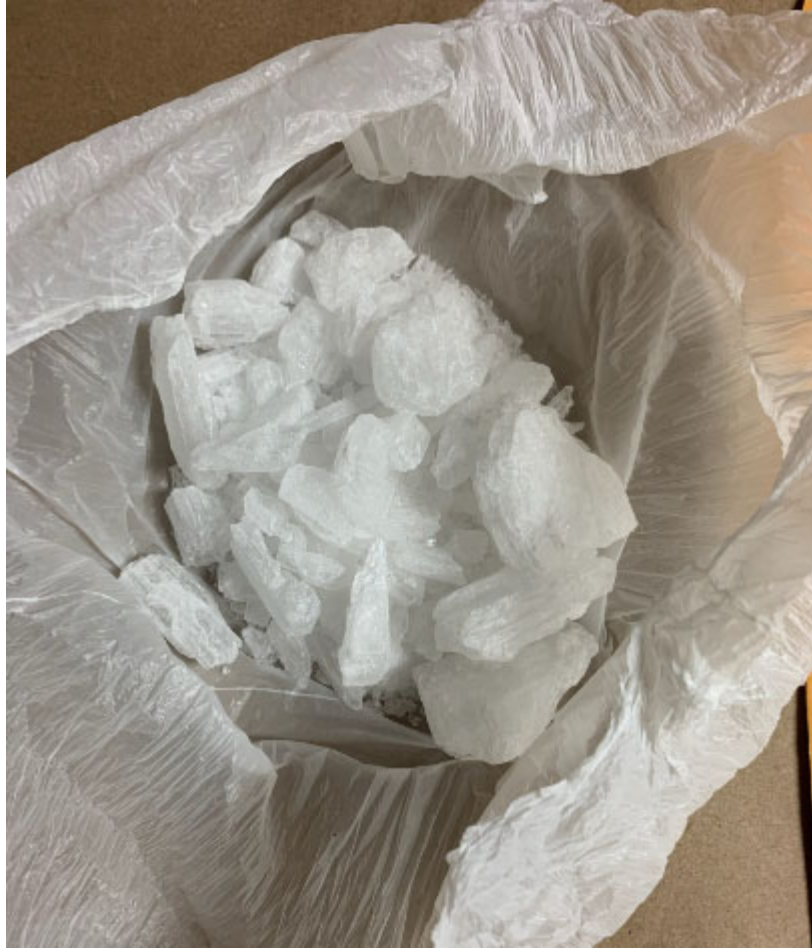
- a. The meet location for the deal was within 200 yards west of 5032 Coopers Landing Drive, Apt 1B in Kalamazoo County, Michigan. The building looks like this:



*Again, the Confidential Informant Uses a Phone to Arrange the Purchase of Approximately ¼ Pound of Methamphetamine from Rashon Miles.*

7. On August 30, 2021, KVET investigators again used CI-2110 to set up another controlled buy of crystal methamphetamine from CI-2110. Investigators employed the same procedures described above on the controlled purchase that occurred on August 4, 2021. In addition, INV Ullman participated in this transaction in an undercover capacity. Once again, CI-2110 drove to the parking lot outside 5032 Coopers Landing Drive. Sergeant Brian Cake, another member of KVET, watched through the transparent window in the common door and saw MILES come out the front door of apartment 1B. He watched MILES continue through the common door and walk directly to the same meet location as the August 4, 2021 controlled purchase. Investigator (INV) Benjamin Ullman and CI-2110 were seated in a vehicle at the meet location. INV Ullman saw Miles deliver the suspected controlled substance pictured below, which weighed approximately ¼ pound and field tested positive for methamphetamine.





*Criminal history and arrest warrant informant for Rashon Miles.*

8. On or about August 31, 2021, INV Ulman conducted a LEIN Query and found that Rashon Miles currently has an outstanding warrant for his arrest. This warrant is a criminal bench warrant for failure to appear for a driving while license suspended charge out of the Kalamazoo Township Police Department.

9. On or about August 31, 2021, INV Ulman conducted a criminal history query for Rashon Miles and found that he is currently on probation with the Michigan Department of Corrections pursuant to Michigan Holmes Youthful Trainee Act (HYTA) for a felony charge of carrying concealed weapons.

*KVET Investigators Arrest Rashon Miles and Find an iPhone.*

10. On September 2, 2021, Miles had an outstanding warrant for his arrest in the State of Michigan. Investigators found Miles and arrested him on that date. During a search incident to arrest of Miles, investigators found a blue Apple iPhone 12 Pro on Miles's person. Law enforcement seized it. Here are pictures of the device:



*Investigators Find Methamphetamine and Another iPhone in Miles's Apartment.*

11. After investigators arrested Miles, they executed a federal search warrant at the apartment linked to the controlled purchases described above. Inside, they found approximately 2.08 pounds (948 grams) of methamphetamine. The drugs were located behind the bed in what appeared to be Miles's bedroom. On top of the same bed, investigators found a second iPhone. This one was a red iPhone SE. It was powered off. Here are pictures of the device:



*In my Training and Experience, Drug Dealers use Cellular Phones.*

12. In my training and experience, cell phones are crucial tools for drug traffickers. Phones remain the most convenient way for traffickers to communicate with customers and suppliers alike. Traffickers can download applications that allow them to send encrypted communications to suppliers and customers, and though these applications are sometimes unrecoverable from the servers of the application provider, key texts, photos, and videos often remain stored on a trafficker's smartphone. In addition, I am aware that drug traffickers often take photos and videos of their product in order to demonstrate its quality to prospective buyers. These photos can provide valuable evidence concerning the types of drugs that a trafficker sells.

13. In my training and experience, it is common for drug traffickers to have more than one cell phone. Sometimes, dealers have one phone that is, essentially, a business phone for their drug contacts, while their other phone remains a device for personal communication. In other cases, dealers use one device to communicate with customers and another to communicate with suppliers, thereby making it impossible for investigators to find one set of contacts without searching both devices.

14. In this case, there is evidence that Miles was using smartphones to coordinate methamphetamine sales. Ricky Vandewege and Joshua Mitchell both discussed communicating with Miles via Facebook messenger, which is commonly downloaded as a smartphone application. Marshall Gurnee discussed communicating with his Kzoo Plug, whom we now know to be Miles, via TextNow, another smartphone application that provides messaging services. In addition, both of the controlled purchases of methamphetamine in this case were arranged via smartphone. From all this, I infer that Miles was himself using a smartphone when he received these communications and responded to them.

### CONCLUSION

15. Based on the information described above, I submit there is probable cause that Rashon Miles is illegally distributing methamphetamine, contrary to 21 U.S.C. § 841(a), and that a search of his two Apple iPhones will uncover more evidence of this crime, as well as of possession with intent to distribute methamphetamine.